

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
Philadelphia Division**

Dominique Lundy,

Debtor.

Case No. 23-12839-AMC
Chapter 13

Motion to Approve Partial Claim Mortgage

Debtor Dominique Lundy, through her attorney, moves this Court as follows:


1. The Debtor filed a bankruptcy petition on September 20, 2023. She has filed a plan and all schedules, statements, and other documents required by 11 U.S.C. §521(a)(1) and Fed. R. Bankr. P. 1007(b).
2. The Debtor's plan has not yet been confirmed.
3. Mortgage Company PennyMac Loan Services, LLC filed a proof of claim docketed as Claim No. 3 for a mortgage secured by the Debtor's principal residence.
4. The Mortgage Company's amended claim filed on April 4, 2024, indicates an arrearage of \$10,238.64 that includes both pre-petition and post-petition arrears in accordance with the stipulation approved by the court on March 25, 2024.
5. The Debtor has entered into an agreement with the Mortgage Company for a partial claim mortgage in the amount of \$10,238.64 to cure the arrearage.
6. The full terms of the partial claim mortgage are set forth in the agreement attached as Exhibit A.

7. Approval of the partial claim mortgage is in the best interests of the Debtor, the Mortgage Company, and the bankruptcy estate.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: October 9, 2024

CIBIK LAW, P.C.
Counsel for Debtor

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Certificate of Service

I certify that on this date, I did cause a copy of this document and all attachments to be electronically served on all parties on the Clerk's service list that are registered to receive notices through the CM/ECF system. I did not serve anyone by mail.

Date: October 9, 2024

By: 
Michael A. Cibik